

Message

From: Paisley-Jones, Claire [Paisley-Jones.Claire@epa.gov]
Sent: 5/7/2021 5:19:40 PM
To: Suarez, Mark [Suarez.Mark@epa.gov]; Johnson, Hope [Johnson.Hope@epa.gov]
Subject: RE: Use pattern-based label information
Attachments: OPPIN list of seed treatment AIs field crops.xlsx

Flag: Follow up

Apparently they'd take any seed... "2020 AltEn- with Integrated Recycling offers Fee Based Disposal Programs for all other Treated, non-treated or regulated non-Ethanol producing seed; as Soybeans, Rye, barley, popcorn and all other."
<https://usrtk.org/wp-content/uploads/2021/01/AltEn-marketing-email-.pdf>

Deliberative Process / Ex. 5

Let me know if you need anything else. We can also talk about writing something up to go with this if we end up wanting to deliver it and not just use it for internal scoping.

Claire

From: Paisley-Jones, Claire
Sent: Thursday, May 06, 2021 1:36 PM
To: Suarez, Mark <Suarez.Mark@epa.gov>; Johnson, Hope <Johnson.Hope@epa.gov>
Subject: RE: Use pattern-based label information

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From: Suarez, Mark <Suarez.Mark@epa.gov>
Sent: Thursday, May 06, 2021 1:27 PM
To: Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>; Johnson, Hope <Johnson.Hope@epa.gov>
Subject: RE: Use pattern-based label information

Looks good, Claire. This was the approach that I was referencing when I mentioned the OPPIN Query approach to Josh in my initial email.

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We might also consider putting something together for EFED to show them how to do these queries themselves.

From: Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>
Sent: Thursday, May 06, 2021 1:11 PM
To: Johnson, Hope <Johnson.Hope@epa.gov>; Suarez, Mark <Suarez.Mark@epa.gov>
Subject: RE: Use pattern-based label information

Yep! Get it to you in a few min. Should be easy now that I decided what to search by ☺

From: Johnson, Hope <Johnson.Hope@epa.gov>

Sent: Thursday, May 06, 2021 1:10 PM

To: Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>; Suarez, Mark <Suarez.Mark@epa.gov>

Subject: RE: Use pattern-based label information

Could you do that for sorghum and soybean as well?

Thanks for this first cut! It will be helpful going into the first meeting with EFED.

From: Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>

Sent: Thursday, May 6, 2021 1:05 PM

To: Johnson, Hope <Johnson.Hope@epa.gov>; Suarez, Mark <Suarez.Mark@epa.gov>

Subject: RE: Use pattern-based label information

Ok, searched for the following sites in OPPIN:

Activity: active

Pesticide type: Conventional (*I assume this is what they're mostly worried about. Basically this filtered out the AIs that only have biochem and PIP uses. It keeps the products that are cross classified*)

Site:



(I got to these by limiting my search by corn and the part of the OPPIN code that's supposed to indicate seed treatment (that's the 90-something at the end of the code)

Enter a value for the site code or name. You may use the % wild card before your entry to enter a partial value. Each site name has an implicit wild card at the right side. You must enter at least two characters. Click the Go button to retrieve relevant sites. Results will be displayed in the list box and one or more values can be selected. Click the OK button to close the window. Selected values will be displayed on the main window.

Site Code:

Site Name:



Product status group: Active and completed

Returns 63 AIs (see attached spreadsheet).

We're dealing with contractor extracted OPPIN sites, so there's stuff in this list that might not really be registered for seed treatment, or they could have missed something, but it's probably a good first cut.

Claire

From: Paisley-Jones, Claire
Sent: Thursday, May 06, 2021 11:46 AM
To: Johnson, Hope <Johnson.Hope@epa.gov>; Suarez, Mark <Suarez.Mark@epa.gov>
Subject: RE: Use pattern-based label information

Interesting! Did a quick google search, and you're definitely right! It's excess treated seed that can't be used for one reason or another (e.g. decreased germination).

https://journalstar.com/news/local/a-dump-for-seed-corn-companies-mead-residents-worry-what-comes-next-for-troubled-ethanol/article_876710c5-52ab-5287-94f3-10c9fbb9c566.html

Well this should be interesting! Because of the treated article exemption, is this even a misuse? When they were selling it as compost it seems like it would have been a misuse, or at least could have led to tolerance exceedances. I wonder how that looks in water monitoring data...

Anyways, based on this statement from the article above, I think we would probably be looking for anything that can be used as a corn seed treatment...

At its peak, the Kansas-owned company was receiving "nearly 98% of all the discard created by the seed industry in North America," it touted to potential customers in the Aug. 3, 2020, email, processing 600,000 to 900,000 pounds of treated seed into ethanol daily.

Seed treatment is something that actually does tend to get picked up in the site name in OPPIN. Let me do some quick scoping and see what I can find.

Claire

From: Johnson, Hope <Johnson.Hope@epa.gov>
Sent: Thursday, May 06, 2021 11:26 AM
To: Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>; Suarez, Mark <Suarez.Mark@epa.gov>
Subject: RE: Use pattern-based label information

I'll find out more at the meeting when Jean sets it up, but my interpretation of her info was treated seed. Treated seed have info on the seed bag tag info on if it can be used for ethanol production if my memory serves me right.

From: Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>
Sent: Thursday, May 6, 2021 11:17 AM
To: Johnson, Hope <Johnson.Hope@epa.gov>; Suarez, Mark <Suarez.Mark@epa.gov>
Subject: RE: Use pattern-based label information

Is it specifically treated seed, or is it seed from corn that may have been treated in the field. The second seems more likely to me. I don't know why you'd pay for treated seed to make ethanol out of, but then again it can be difficult to get corn that hasn't been treated...

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Claire

From: Johnson, Hope <Johnson.Hope@epa.gov>
Sent: Thursday, May 06, 2021 10:29 AM

To: Suarez, Mark <Suarez.Mark@epa.gov>; Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>

Subject: FW: Use pattern-based label information

So Jean gave me a call. This is stemming from an issue in Nebraska regarding ethanol production from seeds and an accumulation of wet cake possibly tainted by pesticides from the treated seeds. The region is interested in finding out the possible pesticides that corn (primarily), sorghum and soybean seeds would be treated with. Would the Kline 2019 report be able to provide anything? I mentioned we may not have a definitive list of chemicals to provide, but could provide the pesticides we would expect would be present in the least. She will be setting up a meeting with us and BAB on this soon. It is expected that ACB and MLB will do some work for the Region on this as well.

Thoughts?

From: Antoline, Joshua <antoline.joshua@epa.gov>

Sent: Wednesday, May 5, 2021 9:49 AM

To: Suarez, Mark <Suarez.Mark@epa.gov>; Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>; OPP Usage and Label Use Team <OPP_Usage_and_Label_Use_Team@epa.gov>

Subject: Re: Use pattern-based label information

Thanks for the information! I will bring this to Jean and see if it goes anywhere. I will point out it would be really nice to have a single database to answer this question.

From: Suarez, Mark <Suarez.Mark@epa.gov>

Sent: Monday, May 3, 2021 9:45 AM

To: Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>; Antoline, Joshua <antoline.joshua@epa.gov>; OPP Usage and Label Use Team <OPP_Usage_and_Label_Use_Team@epa.gov>

Subject: RE: Use pattern-based label information

When I said isolated queries, I was referring to the difficulty/level of effort will vary by the specifics of the query. The effort to identify every pesticide registered for use on lettuce applied via chemigation or oranges via airblast would differ from insecticides for water seeded rice, fungicides applied to apples via air blast, all pesticides for watercress by ground boom are all very different.

From: Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>

Sent: Monday, May 03, 2021 9:12 AM

To: Antoline, Joshua <antoline.joshua@epa.gov>; Suarez, Mark <Suarez.Mark@epa.gov>; OPP Usage and Label Use Team <OPP_Usage_and_Label_Use_Team@epa.gov>

Subject: RE: Use pattern-based label information

Hey Josh,

Following up on what Mark said. That capability doesn't exist now BUT this is the type of thing that OPPEL (nee SmartLabel) is being designed to do. It obviously wouldn't have that capability until it is more or less fully populated for every product (which will take a while), but it would be able to start helping answer this type of question immediately. OPPEL is designed to have registrants submit relevant metadata about their product at the time of registration. Essentially, the registrant would submit the data that's in PLUS and OPPIN (and some additional information) when they submit their label. In addition to the metadata, their label will be structured, so much easier to navigate.

The OPPEL project is currently on hold while ITRMD works on some other projects. But in about three and a half months, we're going back to the DDs to ask for funding to wrap up the project, and for ITRMD to build out the back end database that would allow the types of queries you're talking about. If this type of functionality sounds useful to you, make sure your management knows so they fund the project 😊

I'd be happy to chat more about OPPEL if you're interested and want more info.

Claire

From: Antoline, Joshua <antoline.joshua@epa.gov>
Sent: Monday, May 03, 2021 9:01 AM
To: Suarez, Mark <Suarez.Mark@epa.gov>; OPP Usage and Label Use Team <OPP_Usage_and_Label_Use_Team@epa.gov>
Subject: Re: Use pattern-based label information

Thanks for the info. Yeah, this is just a scoping effort to see what is possible or practical and any official request would go through official channels. I was really hoping that there would be some sort of convenient master list, but where would be the fun in that? One follow up question, when you say "isolated queries", what do you mean? A single active ingredient? A single use pattern/target crop combination? Just trying to get a sense as to what is possible.

Thanks for your help!
Joshua Antoline

From: Suarez, Mark <Suarez.Mark@epa.gov>
Sent: Monday, May 3, 2021 8:23 AM
To: Antoline, Joshua <antoline.joshua@epa.gov>; OPP Usage and Label Use Team <OPP_Usage_and_Label_Use_Team@epa.gov>
Subject: RE: Use pattern-based label information

Josh,

The only way that we would be able to generate this type of a list would be through an OPPIN query, EFED has the same capabilities in OPPIN. The results would not be likely to provide application method and would not be as accurate in terms of use site as any of us would like.

That being said, if you have a few isolated queries, we [ULUT] might be able take a more refined approach, but would need to discuss desired level of accuracy of the output with you. Hope Johnson could work through the feasibility, level of effort, and priority with Jean.

From: Antoline, Joshua <antoline.joshua@epa.gov>
Sent: Monday, May 03, 2021 8:10 AM
To: OPP Usage and Label Use Team <OPP_Usage_and_Label_Use_Team@epa.gov>
Subject: Use pattern-based label information

Hello all,

My name is Joshua Antoline. I'm a scientist in EFED and I'm working on a project where we would like to know every chemical that is registered for a particular target crop and application method combination (e.g., every pesticide that is registered for chemigation to lettuce or airblast to oranges). Is that something that BEAD could generate upon request and, if so, how difficult would it be? I know every individual PLUS report has that information, but I don't know if there is some single master list that you can use to get information across chemicals. Thank you for your time and if you have any questions, please send them my way.

Joshua Antoline